

U.S. Army Corps of Engineers
Attn: CECW-OR/MVD (David Olson)
441 G.Street NW
Washington, DC 20314-1000

COE-2006-0005/ZRIN 0170-ZA02: Nation Wide Permit D for Shellfish Aquaculture

Dear Mr. Olson,

I am the Production Manager for Bradys Oysters Inc. Our company has been farming shellfish in the South Bay of Grays Harbor in Washington State for 35 years. Bradys Oysters Inc. is named after the founder and my father-in-law Brady Engvall. We are a family business. Our company provides ecological, economic and cultural benefits to our community as we grow, process and sell all of our products from our facility just outside of Westport, WA.. We grow Pacific, Olympia and Kumamoto oysters.

Shellfish growers are the most active clean water, healthy environment group that I have come across. I am an active environmentalist. While I have seen only positive impacts from our shellfish farming such as an increased biodiversity on oyster beds and the improved water quality from the accumulative filtering of the oysters. The Army Corps deep draft project through the middle of our bay is by far the most ecologically damaging force in our bay. Our Oyster beds provide habitat for a variety of crab, gunnel, nudibranch, worms, isopods as well as other shellfish such as mussels and cockles.

While our beds don't have much in the way of SAVs those that are there are certainly as healthy now as perhaps ever.

Economically we have provided both entry level and family wage jobs for 35 years.

We have tourist visit us from all over the world whom have never eaten or seen an oyster. They are always amazed and interested about these fantastic animals. We provide tours and information for visitors and I believe if you were to ask them if we are a benefit to our community/society they would say yes we are needed and important.

The benefits and lack of actual demonstrated adverse impacts of shellfish farming seems to require you to provide us with a national permit. There are some points of interest contained in this permit draft that I don't agree with.

The "Pre-Construction Notice appears to be a bureaucratic boondoggle. There should be a proven need for much of this based on current conditions and scientifically proven facts not assumptions.

Shellfish are recognized for providing benefits for eelgrass and they have been used to enhance eelgrass populations through federally funded projects, so it doesn't make sense to impose restrictions to existing farms that are found to co-habitat with eelgrass beds.

I do not believe there should be restrictions on what species we choose to cultivate. Markets and technology change rapidly. To impose such restrictions when we have complied with all applicable local, state and federal laws that approve these other species is short sighted. This also appears to be a matter for the Fish and Wildlife department rather than the Army Corps.

As a member of PCSGA I also subscribe to their Environmental Codes of Practice and I am developing my own Farm Plan that is specific to my farming operations. As a farmer that depends upon the marine environment for my livelihood, I am committed to operating my farm in the most sustainable manner possible.

Thank you for the opportunity to comment on these important issues. I hope that you will see the value of our shellfish farming efforts and create a permit that will protect our ability to continue to produce high quality food products well into the future.

Sincerely,

Mark Ballo
Production Manager
3714 Oyster Pl.
Aberdeen, WA 98520
360-268-0077